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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND - NORTHERN DIVISION

CLERK'S OFFICE
AT BALTIMORE

REGINA DICKERSON, et al.

*

Plaintiffs

*

v.

*

McDONALD'S CORPORATION, et al.

*

Defendants

*

BY _____ DEPUTY

CIVIL ACTION NO: L00-CV-337

PROTECTIVE ORDER

It being represented to the court that plaintiffs, Regina Dickerson and John Dickerson, have requested documents from the defendant, McDonald's Corporation, which involve trade secrets, confidential research, proprietary materials and development and/or commercial information belonging to McDonald's Corporation; and

It being represented to the court that McDonald's Corporation is willing to provide these documents for inspection and review only under a protective order upon the hereinafter stated terms and conditions; and

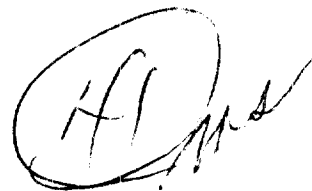
It being presented to the court that all of the parties are in agreement as to the terms of the said protective order; therefore,

It is hereby ORDERED that:

1. McDonald's Corporation will disclose documents that it designates "confidential and proprietary" to the parties to this suit and their attorneys, only pursuant to this order and under the conditions that follow.

2. Any and all of the aforesaid materials disclosed by McDonald's Corporation and the contents thereof shall be maintained in confidence by counsel for

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the plaintiff and counsel for the other parties to the above captioned litigation. The aforesaid materials shall not be photocopied or reproduced by any means without the prior consent of counsel for McDonald's Corporation or until further order of this court.

3. Any and all of the aforesaid materials disclosed by McDonald's Corporation and the contents thereof shall be used only in connection with the above captioned matter and shall not be used for any other purpose whatsoever.

4. No person who examines any document produced pursuant to this order shall disseminate orally, in writing, or by any other means, the document(s) or the information contained therein, to any person not also authorized to examine documents under the terms of this order.

5. Counsel for plaintiff and counsel for the other parties to the above captioned litigation may permit an expert or experts hired by the plaintiff or other parties in the above captioned litigation to review the documents subject to this protective order, but counsel for the plaintiff and counsel for the other parties must first obtain from said experts a written statement confirming the expert's agreement to comply with every element of this protective order. Said experts shall agree that the document and the contents thereof shall not be disclosed to any other person or entity and said documents and the contents thereof shall not be disclosed to any other person or entity and said documents shall not be photocopied or reproduced by any means. Any documents provided to experts must be returned to McDonald's Corporation with thirty days of the conclusion of the above captioned litigation pursuant to the terms of paragraph 8 below.

6. Notwithstanding the foregoing provisions, this order shall be without prejudice to the right of any party to challenge the propriety of discovery on any grounds including, but not limited to, relevance, privilege and materiality.

7. Notwithstanding the foregoing provisions, this order shall not restrict in any manner the right of any party to offer or use as evidence at the trial of the action any of the documents subject to this protective order and nothing contained herein shall be construed as a waiver of any objection with might be raised as to the admissibility of any evidentiary materials.

8. At the conclusion of the lawsuit by settlement, a jury verdict, nonsuit, dismissal, by judgment order or otherwise, all McDonald's Corporation materials, including any and all copies or renditions made from the materials, shall be returned to McDonald's Corporation within thirty (30) days.

9. Challenges to materials deemed confidential which are not produced for inspection shall be resolved by motion to compel by the party seeking production, and the burden to establish confidentiality on the party objecting to production.

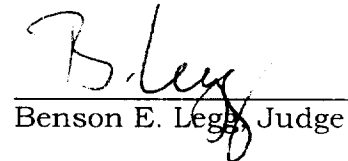
10. All materials subject to the confidentiality order that are filed with the court shall be done so under seal with the party filing the material(s) simultaneously submitting a motion and accompanying order pursuant to L.R. 105.11.

11. At the conclusion of the litigation, the clerk shall contact counsel for McDonald's Corporation and advise that any sealed material(s) can be retrieved within thirty (30) days. Otherwise, the materials will be destroyed.

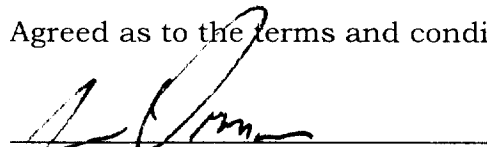
12. A breach of the terms of this order shall entitle McDonald's Corporation to appropriate sanctions, including but not limited to attorneys fees and costs incurred in the enforcement of this order.

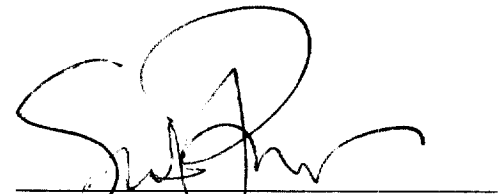
Signed this the 2nd day of August, 2000

ENTERED:


Benson E. Legg, Judge

Agreed as to the terms and conditions:


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managers and employees;
Thomas Baxter, individually; and
Baxter Enterprises, Inc.

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VIA HAND DELIVERED

July 28, 2000

The Honorable Benson E. Legg
United States District Court
for the District of Maryland
101 E. Lombard Street
Baltimore, MD 21201

RE: Regina Dickerson, et al. v. McDonald's Corporation. et al.
Case No: L-00-CV-337
Our File No.: M02-161484

Dear Judge Legg:

Counsel for the parties in the referenced case have entered into a stipulation regarding the confidentiality of documents to be exchanged. Attached for your review and consideration is the stipulation executed by both counsel.

We respectfully request that Your Honor execute the attached protective order so that we can expedite the exchange of documents. If a more formal request is required, please advise. Otherwise, we thank you for your consideration of our request.

Very truly yours,



Guido Porcarelli
GP:mar

Attachment

cc: Leonard Orman, Esquire
Milton S. Savage, Jr., Esquire